

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

NORMAN TODD,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 2:07-cv-149-MEF
)	
CITY OF CLANTON, et al.,)	
)	
Defendants.)	

**PLAINTIFF'S REPLY TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

COMES NOW the Plaintiff and in response to Defendant's Motion for Summary Judgment submits the following:

1. Plaintiff's prior Objection to Order Converting the Defendants' Motion to Dismiss to Summary Judgment (Doc. 14) and Counsel's Rule 56 Affidavit submitted therewith
2. Plaintiff's Complaint (Doc 1) and Response to Defendants' Motion to Dismiss (Doc. 4) including the Brief and Memorandum of Law and pleadings.
3. Plaintiff's Narrative Summary of Facts and Brief and Memorandum of Law submitted in Reply to Defendants' Motion for Summary Judgment.
4. Plaintiff's Evidentiary Submissions submitted in Reply to Defendants' Motion for Summary Judgment.
5. Plaintiff respectfully shows that based upon the above and foregoing that there are genuine issues of material fact and that Defendants' Motion for Summary Judgment is due to be denied.

Respectfully submitted,

/S/Donald G. Madison
DONALD G. MADISON (MAD 008)
Attorney for Plaintiff
418 Scott Street
Montgomery, Alabama 36104
Telephone (334) 263-4800
Facsimile (334) 265-8511
E-Mail dgmadison@bellsouth.net
btjarvis1@bellsouth.net

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed and that a copy of same will be electronically served upon the following parties on this the 2nd day of November, 2007.

James W. Porter, II, Esquire
Porter, Porter & Hassinger
Post Office Box 128
Birmingham, Alabama 35201-0128
Email: jwporders@pphlaw.net

Natalie Ann Daugherty
Porter, Porter & Hassinger
215 21st Street North
Suite 1000
Post Office Box 128
Birmingham, Alabama 35203
Email: ndaugherty@pphlaw.net

/S/Donald G. Madison